

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

---

UNITED STATES OF AMERICA,  
Plaintiff,

v.

Case No. 21-CR-5

TINA MONTEZON,  
Defendant.

---

**MOTION TO TRAVEL TO NEW JERSEY IN SEPTEMBER 2022**

---

NOW COMES the Defendant, Tina Montezon, by and through her attorneys, Kohn & Smith Law Offices, by Attorney Jonathan C. Smith, and upon all the files and record had heretofore herein hereby respectfully moves this Honorable Court for the entry of an Order allowing her to travel to Glen Gardener, New Jersey, to visit her sister-in-law with her daughter and grandchildren. It would be her intention to drive to New Jersey, beginning on September 3, 2022, and return by September 13, 2022, necessitating travel through Illinois, Indiana, Ohio, Pennsylvania and New Jersey. It should be noted that this travel was previously approved for March of 2022, however due to inclement weather the defendant was unable to complete the same. Finally, the undersigned has communicated with AUSA Kevin Knight who has indicated that the Government does not have an objection to this request.

Dated at Milwaukee this 25<sup>th</sup> day of July, 2022.

Respectfully Submitted,

**KOHN & SMITH**

Attorneys for the Defendant

s/ *Jonathan C. Smith*

Jonathan C. Smith

SBN: 1022413

P.O. Address:

1110 N. Dr. Martin Luther King Jr. Drive  
Suite 201

Milwaukee, WI 53203

Phone: 414.273.0203

Fax: 414.273.8408

Email: [jcskas@gmail.com](mailto:jcskas@gmail.com)